

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

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CASE NO. 95-10007-CR-KING  
CASE NO. 00-6308-CR-KING

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**UNITED STATES OF AMERICA,**

*Plaintiff,*

*vs.*

**LUIS NAVIA,**

*Defendant.*

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**UNOPPOSED MOTION FOR PERMISSION TO TRAVEL ABROAD**

**COMES NOW** the Defendant, LUIS NAVIA, by and through his undersigned attorney and files this his Motion for Permission to Travel Abroad and as grounds therefor would state as follows:

1. In early December this Honorable Court granted the Defendant permission to travel to Mexico City for the purpose of picking up his minor son and bringing him back to the United States for the holidays. During the course of his departure with his son from Mexico, the authorities there gave him some difficulty due to the dual citizenship status of the child. Although this matter was resolved it was not without some difficulty.

2. The child is now scheduled to return on Monday, January 7th, 2008 on Mexican flight 306 at 7:55 A.M. The Defendant had not anticipated any difficulties when he departed from Mexico but he is now concerned that the Mexican authorities may refuse entry to his minor son upon arrival in Mexico to be reunited with his mother. Accordingly, the Defendant would prefer to travel back to Mexico with his 10 year old son so that he may be by his son's side in the event of a problem. He would return to this district within five days of his arrival in Mexico. The Defendant

will reschedule the return flight to Mexico until such time as he can obtain a response from the Court of the instant motion. It should be noted that the child's school classes begin January 7th, 2008.

3. Undersigned counsel has been informed that the United States Probation Officer does not object to the relief sought herein. The Probation Officer is currently on vacation but will be back in her office on Monday, January 7th, 2008.

**W H E R E F O R E**, the Defendant respectfully prays that he be allowed to travel abroad and outside the district as provided above.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 4th day of January, 2008 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and a copy was mailed to Ms Lisa Acosta, U.S. Probation Officer, United States Probation Office, 330 Biscayne Blvd., Suite 410, Miami FL 33132.

Respectfully submitted,

**ROJAS & OLIVA, P.A.**  
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